

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

IN RE: WASHINGTON MUTUAL
MORTGAGE BACKED SECURITIES
LITIGATION,

This Document Relates to: ALL CASES

Master Case No. C09-037 MJP

[Consolidated with: Case Nos.
CV09-0134 MJP, CV09-0137 MJP, and
CV09-01557 MJP]

**DECLARATION OF MATTHEW
JACKSON IN SUPPORT OF MOTION
FOR ENTRY OF REVISED
CONFIDENTIALITY ORDER
RELATING TO LOAN FILE
PRODUCTIONS**

**Hearing Date: November 25, 2011
w/o Oral Argument**

Matthew S. Jackson deposes and states as follows:

1. I am a litigation staff lawyer with Sidley Austin LLP. I have reviewed various loan origination files that have been produced in this case.
2. Plaintiffs' requests for production in this matter encompass more than 14,000 mortgage loans. The files for these loans are extremely voluminous, sometimes totaling more

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Case No. C09-037-MJP

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1 than a thousand pages for a single loan. On information and belief, of the 14,000 loans, 957
2 potentially implicate the financial privacy laws of Illinois, Maryland, Montana, New Jersey,
3 Rhode Island, Texas, or Vermont. On information and belief, the loan files for those 957
4 loans contain 52,395 documents totaling 787,453 pages.

5
6 3. Based on my experience in this and other similar cases, loan files can be
7 reviewed for nonpublic personal information and redacted at a rate of approximately 45 pages
8 per hour. Reviewing all 787,453 pages of the loan files potentially implicating the financial
9 privacy laws of the states listed above would thus take a total of approximately 17,500 total
10 hours of review time.

11 I hereby declare, under penalty of perjury under the laws of the United States of America,
12 that the foregoing is true and correct.
13

14 DATED this 16th day of November, 2011.

15 /s/ Matthew S. Jackson
16 Matthew S. Jackson
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CERTIFICATE OF SERVICE

The undersigned certifies as follows:

1. I am employed at Corr Cronin Michelson Baumgardner & Preece LLP, attorneys for JP Morgan Chase Bank, N.A. herein.
2. On November 16, 2011, I caused a true and correct copy of the foregoing document to be served on the following parties in the matter indicated below:

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18 I declare under penalty of perjury under the laws of the State of Washington that the
19 foregoing is true and correct.

20 DATED this 16th day of November, 2011, at Seattle, Washington.

21 /s/Heidi M. Powell

22 Heidi M. Powell

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